These comments are in regard to proceeding RM-10413.

Although I do agree that the phone sections of the affected bands are indeed crowded, re-allocation of the old Novice band segments is not in keeping with the intended future direction of the Amateur Radio Service.

Since more emphasis is being placed on digital communcations and more experimentation occuring in this area, re-farming the Novice band segments in their entirety to phone ops does not provide for the future.

I would agree with re-farming part of those sub-bands in order to alleviate the immediate situation on the phone bands while still leaving some extra room within the CW/Data portions of the affected bands.

Thank you for the opportunity to comment on this issue.

Very truly yours,

--Scott D. Hernalsteen/W8CQD